

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

John K. Goodrow,

:

Plaintiff,

:

v.

:

Civil Action No: 3:11-cv-00020-MHL
(Consolidated)

Friedman & MacFadyen, P.A. and
Johnie R. Muncy,

:

:

Defendants.

JOINT MOTION TO EXTEND STAY

The parties now jointly move for an extension of the stay previously entered in these consolidated matters [Docket Entry 30] for the following reasons:

1. On February 13, 2012 counsel for plaintiffs provided initial data concerning numerous claims to counsel for the plaintiffs with the intention that the data be the basis for a global settlement in this matter.
2. The parties, by counsel, have agreed that counsel for defendants will reply to this production with a position statement regarding these claims on March 30, 2012.
3. The parties, by counsel, have engaged the Honorable Dennis Dohnal (retired) with the McCammon Group to mediate this matter and on March 1, 2012 held an initial planning telephone conference with him.
4. A follow up pre-mediation call is scheduled for April 23, 2012.
5. Mediation in this matter is scheduled for May 2-3, 2012.

6. The parties hope that these matters might be satisfactorily resolved on or about the date of the scheduled mediation and, if that is the case, anticipate requiring an additional short period of time to finalize any agreement and implement any relevant settlement terms.

For the foregoing reasons, the parties jointly request an extension of the entered stay in these matters until June 15, 2012.

DATED: March 21, 2012

Respectfully Submitted,

**FRIEDMAN & MACFADYEN, P.A.
JOHNIE MUNCY**

By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

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